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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

Case No. C-07-1827 SI

MDL No. 1827

This Document Relates To:

REQUEST FOR INTERNATIONAL
JUDICIAL ASSISTANCE
(LETTER ROGATORY)

ALL DIRECT PURCHASER ACTIONS

1 The United States District Court for the Northern District of California presents its compliments
2 to the Appropriate Judicial Authority of Taiwan, and requests international assistance to effect Service of
3 Process to be used in a civil proceeding before this Court in the above captioned matter.

4 **I. REQUEST**

5 This Court requests the assistance described herein as necessary in the interests of justice. The
6 assistance requested is that the Appropriate Judicial Authority of Taiwan effect Service of Process of the
7 Summons in a Civil Case; Direct Purchaser Plaintiffs' Consolidated Complaint with attached Exhibit A;
8 Pretrial Order No. 5: Case Management; Judge Illston's Standing Order; Standing Order Re: Cases
9 Designated for Electronic Filing; Case Management Conference Order; Pretrial Order No. 4:
10 Appointment of the Honorable Fern M. Smith as Special Master; Dispute Resolution Procedures in the
11 Northern District of California handbook; Notice of Availability of Magistrate Judge to Exercise
12 Jurisdiction; ECF Registration Information Handout and Certified Translations on the below named
13 business entity, a named defendant in this action:

14 Chi Mei Optoelectronics Corporation
15 No. 3, Sec. 1, Huanshi Road
16 Southern Taiwan Science Park, Sinshih Township
Tainan County, 74147
Taiwan

17 The Appropriate Judicial Authority of Taiwan is requested to serve the documents listed above by
18 personal service into the hands of a director, managing agent or other person authorized to accept service,
19 or in a manner of service consistent with the law of Taiwan.

20 **II. FACTS OF THIS CASE**

21 Plaintiffs, who purchased, in the United States, Thin Film Transistor Liquid Crystal Displays
22 ("TFT-LCD") directly from defendants between January 1, 1996 and December 11, 2006, bring this case
23 as a class action. Defendants are leading manufacturers of TFT-LCDs and control the majority of the
24 TFT-LCD industry. Plaintiffs allege that, between January 1, 1996 and December 11, 2006, defendants
25 conspired, combined and contracted to fix, raise, maintain, and stabilize the prices at which TFT-LCDs
26 were sold in the United States. Beginning at least as early as January 1, 1996, the exact date being
27 unknown to Plaintiffs, defendants, by and through their officers, directors, employees, agents, or other
28

representatives, entered in a continuing contract, combination or conspiracy to unreasonably restrain trade and commerce in violation of Section 1 of the Sherman Antitrust Act, 15 U.S.C. §1. As a result, Plaintiffs were forced to pay more for TFT-LCDs than they would have paid in a competitive TFT-LCD market. For their injuries, Plaintiffs are requesting treble damages and an injunction enjoining defendants' anti-competitive activity under sections 4 and 16 of the Clayton Act, 15 U.S.C. §§ 15 and 26.

III. RECIPROCITY

The United States District Court for the Northern District of California is willing to provide similar assistance to the judicial authorities of Taiwan.

IV. REIMBURSEMENT FOR COSTS

Counsel for Plaintiffs is willing to ensure reimbursement to the judicial authorities of Taiwan for costs incurred in executing this letter rogatory. If the cost of executing this Court's letter rogatory exceeds \$500.00, the judicial authorities of Taiwan are requested to contact the following counsel for Plaintiff:

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In acknowledgment of the additional time which is needed to prepare and file a responsive pleading to the attached documents, the time period is extended to 45 days after service.

Dated: 11/20/07, 2007.

[COURT SEAL]



The Honorable Susan Illston
United States District Court
Northern District of California
450 Golden Gate Ave.
San Francisco, CA 94102
United States of America

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